

IN THE UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

In Re: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

CASE NO: 2:15-MD-02641-DGC
MDL No. 2641

This Document Relates to:

2:16-cv-00890-DGC

Steven Bushman and Donna Bushman vs. Bard, et al.

UNOPPOSED MOTION FOR LEAVE TO AMEND COMPLAINT

Counsel, pursuant to Rule 25910(1) of the Federal Rules of Civil Procedure, moves this Court for an order amending the Complaint.

1. Plaintiffs seek leave to file the attached short form complaint to correct Paragraph 3 to read “N/A,” and Paragraph 4 to read “Maryland” instead of “Florida.” (see Amended Third Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial).

2. Plaintiffs’ counsel has conferred with Defendants’ counsel and Defendants do not oppose the filing of this motion.

Based on the foregoing, requests that this Court grant this request to correct Paragraph 3 to read “N/A,” and Paragraph 4 to read “Maryland,” and for leave to file the Amended Third Amended Master Short Form Complaint for Damages for Individual Claims and Demand for Jury Trial, and direct the Clerk to file the attached Amended Third Amended Master Short Form Complaint.

Dated: February 15, 2017

/s/ Joseph R. Johnson

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/ Joseph R. Johnson _____